

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Ronaldo Ligons, et al.,

Court File No. 15-CV-2210 (PJS/BRT)

Plaintiffs,

vs.

**DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

Minnesota Department of Corrections, et al.,

Defendants.

TO: Plaintiffs Ronaldo Ligons, Lawrence Maxcy, Brent Buchan, and Barry Michaelson, and their attorneys, Andrew H. Mohring, Esq., Esther O. Agbaje, Esq., Michael V. Ciresi, Esq., and Katie Crosby Lehmann, Esq., Ciresi Conlin LLP, 225 South 6th Street, Suite 4600, Minneapolis, MN 55402, Peter J. Nickitas, Esq., 431 South 7th Street, Suite 2446, Minneapolis, MN 55415-0221 and C. Peter Erlinder, Esq., 1043 Grand Avenue, Suite 28, St. Paul, MN 55104.

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendants hereby move the court for an order as follows:

Granting Defendants Minnesota Department of Corrections, Commissioner Thomas Roy, Dr. David A. Paulson, M.D., and Nanette Larson summary judgment and dismissing all claims in the Third Amended Complaint with prejudice.

This motion is made pursuant to Rule 56 of the Federal Rules of Civil Procedure, and upon a memorandum of law and any supporting documents filed in accordance with Local Rules.

*Signature on page 2*

Dated: April 18, 2018

OFFICE OF THE ATTORNEY GENERAL  
State of Minnesota

s/ **Kathryn A. Fodness**

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MINNESOTA DEPARTMENT OF  
CORRECTIONS, ROY, PAULSON, AND  
LARSON